

EXHIBIT A

Defendants' Response to Plaintiff's Request to Produce
and Proof of Service

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MANUEL STAPLETON,

Plaintiff,

v.

CASE NO.: 2:13-cv-11848-SJM-LJM
HON. STEPHEN J. MURPHY III
MAG. JUDGE LAURIE J. MICHELSON

CITY OF MELVINDALE,
OFFICER BRIAN BROWNING,
BADGE #ME037

Defendants.

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DEFENDANTS' RESPONSE TO PLAINTIFF'S REQUEST TO PRODUCE
and PROOF OF SERVICE

NOW COME the Defendants, CITY OF MELVINDALE and OFFICER BRIAN BROWNING, by and through their attorneys, PLUNKETT COONEY, and for their Response to Plaintiff's Request to Produce, state as follows:

REQUESTS

1. Copies of all lawsuits filed against the Defendant Police Department from 2007 to the present date.

RESPONSE:

Defendants object to this request to produce as it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the Melvindale Police Department is not a separate legal entity capable of being sued. Finally, lawsuits filed against the City of Melvindale are matters of public record and easily accessible by the Plaintiff.

2. Copies of all reports, statements concerning the incident identified in Plaintiff's Complaint.

RESPONSE:

All such reports / statements concerning the incident identified in Plaintiff's Complaint have been produced as part of Defendants' Initial Disclosures.

Respectfully submitted,

PLUNKETT COONEY

By

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Dated: July 9, 2013

Proof of Service

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause by mailing the same to them at their respective business addresses as disclosed by the pleadings of record herein, with postage fully prepaid thereon on July 9, 2013. I declare under the penalty of perjury that the statement above is true to the best of my information, knowledge and belief.


KATHALEEN M. FORDE